

EXHIBIT E

Subject: FWC - Challenge (16) to "Confidential" Designations
Date: Wednesday, November 8, 2023 at 11:40:57AM Eastern Standard Time
From: Corey Stern
To: Michael A. Olsen, Jim Campbell
CC: Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block, Kiersten Holms, Josh Dischinger

Attachments: 2023.11.08 Letter to Veolia (16th Confidential Designations) [84].pdf

Counsel for Veolia:

Please find correspondence related to the above referenced matter attached.

Best,

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November 8, 2023

VIA EMAIL & CERTIFIED MAIL (RRR)

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**RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS
CHALLENGE (16) TO “CONFIDENTIAL” DESIGNATIONS**

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,¹ Plaintiffs hereby formally challenge the “Confidential,” “Highly Confidential,” and/or “Highly Confidential – Attorneys' Eyes Only” designations of the following documents:²

1. VWNAOS513008-VWNAOS513008.0014
2. VWNAOS312143-VWNAOS312143.0041
3. VWNAOS528554-VWNAOS528554.0001
4. VWNAOS513038-VWNAOS513038.0018
5. VWNAOS528301-VWNAOS528301.0001
6. VWNAOS512977-VWNAOS512977.0027
7. VWNAOS545313-VWNAOS545313.0001
8. VWNAOS528692-VWNAOS528692.0021
9. VWNAOS540542-VWNAOS540542.0001
10. VWNAOS511018-VWNAOS511018.0007
11. VWNAOS528154-VWNAOS528154.0012

¹ See Case No. 16-cv-10444 (ECF. No. 1255-3).

² Some documents/groups of documents appear to be duplicative but were produced numerous times with varying Bates numbers.

12. VWNAOS527067-VWNAOS527067.0012
13. VWNAOS512885-VWNAOS512885.0019
14. VWNAOS513052-VWNAOS513052.0023
15. VWNAOS527087-VWNAOS527087.0001
16. VWNAOS538319-VWNAOS538319.0002
17. VWNAOS528104-VWNAOS528104.0001
18. VWNAOS544982-VWNAOS544982.0003
19. VWNAOS545011-VWNAOS545011.0013
20. VWNAOS553137-VWNAOS553137.0002
21. VWNAOS512928-VWNAOS512928.0016
22. VWNAOS528061-VWNAOS528061.0038
23. VWNAOS528169-VWNAOS528169.0029
24. VWNAOS512988-VWNAOS512988.0014
25. VWNAOS528021-VWNAOS528021.0003
26. VWNAOS511022-VWNAOS511022.0011
27. VWNAOS528159-VWNAOS528159.0001
28. VWNAOS528562-VWNAOS528562.0003
29. VWNAOS526996-VWNAOS526996.0009
30. VWNAOS527920-VWNAOS527920.0002
31. VWNAOS528149-VWNAOS528149.0002
32. VWNAOS527083-VWNAOS527083.0012
33. VWNAOS511447-VWNAOS511447.0016
34. VWNAOS528109-VWNAOS528109.0006
35. VWNAOS527093-VWNAOS527093.0001
36. VWNAOS531833-VWNAOS531833.0010
37. VWNAOS528408-VWNAOS528408.0002
38. VWNAOS553605-VWNAOS553605.0001
39. VWNAOS527916-VWNAOS527916.0003
40. VWNAOS553625-VWNAOS553625.0001
41. VWNAOS536531-VWNAOS536531.0001
42. VWNAOS553652-VWNAOS553652.0003
43. VWNAOS311337-VWNAOS311337.0001
44. VWNAOS528416-VWNAOS528416.0003
45. VWNAOS511965-VWNAOS511965.0023
46. VWNAOS553566-VWNAOS553566.0002
47. VWNAOS528325-VWNAOS528325.0003
48. VWNAOS531828-VWNAOS531828.0004
49. VWNAOS528592-VWNAOS528592.0002
50. VWNAOS528305-VWNAOS528305.0001

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations **and to reproduce each document without any redactions**, whether noted herein or not.

Very Truly Yours,

LEVY KONIGSBERG, LLP



Corey M. Stern

Cc: *(By email only)*
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All Veolia Entities' Counsel of Record or otherwise known